

EXHIBIT 3

DECLARATION OF JOHN DOE 3

I, John Doe 3, declare and state the following:

1. I am 15 years old. I was born in Honduras.
2. I left Honduras because I was being persecuted by the "18 gang" who threatened to kill me.
3. My girlfriend and I fled to Guatemala and then travelled to Mexico. My girlfriend wanted to go back to Honduras, but I told her that I couldn't, because the gang was going to kill me.
4. With a friend, I took buses and jumped on trains through Mexico to get to the United States. It took us something like 25 days to get to the US border from Mexico.
5. I was picked up by immigration right after I crossed the border. I was placed at a house in Texas and then moved to a house in San Antonio, where I stayed for about a month. I was then moved to a center called BCFS where I stayed for about two weeks. After that, I was moved to Shenandoah.
6. To get to Shenandoah, they put me on three planes. I kept asking where I was going but they never told me. It took a long time and put me in a bad mood.
7. They said the reason for the moves from place to place was because I was a member of MS-13. I told them I was not part of anything.
8. When we landed at the airport, a grey van was waiting to transport me to Shenandoah. They put cuffs on my hands that were connected to a belt around my waist and put cuffs on my feet. When I asked them why they put us in handcuffs, they said that everyone

who is transported here gets handcuffs. I threw a fit. I asked what was going on and kicked a chair. They put handcuffs on my hands and legs.

9. At Shenandoah, I was put in restriction for any little thing. I was put in restriction many times; more than 10. They restrict me when I get angry and send me back to the pod. I get angry because of the things they do.
10. On one occasion, going to art class, I held the door open so everyone could enter. A staff member yelled at me for doing this, and I asked him why he was yelling at me and bringing his anger here. In response, the staff member lunged towards me, and I crouched down to avoid him. He fell and then restrained me, putting my hands behind my back and slamming my face into the wall. I maneuvered my way out of the hold and asked, "what is happening"? Then two staff members slammed my body to the ground and, when they picked me back up, shoved me against the wall again.
11. After this, they put me in restriction in my room. They took away my mattress and my blanket and left me only in my boxers. I was left in my room all day without clothes and it was very cold. I did not get the mattress and blanket back until 9:00 that night. I did not get my clothes back until the next morning.
12. On another occasion, I moved the TV in the pod so that the light wouldn't hit it and we could see better. A staff member came over and took a point away from me for that and put me in restriction. Whenever I was put in restriction, they took away my mattress and blanket. They took my clothes away about 8 times.
13. About four times when they put me in restriction, staff put cuffs on my hands and my feet inside my room. The cuffs were very tight and left marks on my wrists. One night in

particular I couldn't sleep well because of the pain in my wrists. When I was cuffed, staff also hit me. They came into my room and started hitting me.

14. One time I got angry when staff sent me to my room. I hit the door with my fist and my hand started bleeding. Staff then they put cuffs on me and I was strapped to a chair with a belt. I was just in my boxers. I was there for definitely more than half an hour. I was crying. Staff said that they did it to calm me down. No one did anything for my bleeding hand.
15. Another time I put paper over the window in the door to my room for privacy. A lot of staff came into the room with plastic shields and swarmed over me. A large staff member put all his weight on me. I had scratches and bruises all over my arms.
16. Staff members take away points without telling me. When I ask how many points I have, they tell me 4 to 5 points less than I have. That makes me mad. I ask the supervisor why they do this and say that they are messing up. They don't give me an answer. I think they do things to make me angry so that I will hit them and then charges will be pressed and I will get a longer sentence.
17. Staff take away points for little things. They take away points when I don't want my food and give it to a friend. Some staff take away points when you don't raise your hand.
18. I feel like people here are racist. The American kids are treated differently. For example, an American kid asked for chapstick and got it immediately. I asked for Vaseline for my lips which were chapped and hurting. I got it eventually but not immediately.
19. The pods for the American kids are very different than the pods for the Hispanic youth. Bravo and Echo, the pods for the American youth, have soft chairs, X-boxes all week

and I-pods. The immigrant youth have steel chairs, no I-pods and have X-boxes one to three times a week.

20. We get special food, like Burger King and pizza, on Tuesdays. My Honduran friends who arrived this past Saturday did not get the special food on the following Tuesday, but the American kids who also arrived on that Saturday got the special food.
21. Staff is disrespectful to us. When I asked a friend to ask a staff member why the staff member was taking away so many points, the staff member said to my friend, "tell that Hispanic guy to tell me in English".
22. If something hurts, I can see a doctor. But I don't get medicine until much later than I ask for it. I get very strong headaches, that are so bad that they make me cry. Many times when I ask for medicine I have to wait a long time. When I had a stomach ache, I did not get medicine until a week after I asked for it. Then it was pointless.
23. We got six vaccinations at a clinic. I do not know what the shots were for. They had us in hand and leg cuffs the entire time we were in public. People stared at us.
24. I am taking medications for anger and to help me sleep. I would like calcium and iron supplements but they refused to give them to me.
25. I have been on good behavior for three months. I should have been stepped down after 30 days of good behavior. I am upset that I haven't been stepped down. I will talk to my case manager about that.

26. I want us to be treated as human beings.

This statement has been prepared in English but has been read to me in Spanish by a bilingual interpreter. I declare, under penalty of perjury, that all the information I have provided here is correct and complete to the best of my knowledge. I am aware of the legal consequences of making a false declaration.

Executed this 5 day of January, 2018, in Staunton, Virginia

JOHN DOE 3